

Elden M. Rosenthal, OSB No. 722174

Email: elden@rgdpdx.com

Michael A. Greene, OSB No. 802445

Email: mike@rgdpdx.com

John T. Devlin, OSB No. 042690

Email: john@rgdpdx.com

Rosenthal Greene & Devlin, P.C.

121 SW Salmon Street, Suite 1090

Portland, OR 97204

Phone: (503) 228-3015

Fax: (503) 228-3269

Of Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

DEREK JOHNSON, personal representative
of KELLY CONRAD GREEN II, deceased;
KELLY CONRAD GREEN and SANDY
PULVER,

Plaintiffs,

v.

CORIZON HEALTH, INC., a Tennessee
Corporation; LANE COUNTY, an Oregon
county; DR. JUSTIN MONTOYA, an individual;
VICKI THOMAS, an individual; KIRSTIN
WHITE, an individual; and SHARON
EPPERSON (née FAGAN), an individual,

Defendants.

Civil Action No. 6:13-cv-01855-TC

**DECLARATION OF JOHN T.
DEVLIN IN SUPPORT OF
PLAINTIFFS' THIRD MOTION
TO COMPEL PRODUCTION
OF DOCUMENTS**

I, John T. Devlin, declare under penalty of perjury as follows:

1. I am one of the attorneys for the plaintiffs in this case.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from Corizon's 2015 proposal for the Lane County contract. This document also is marked as Trial Exhibit 168.
3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the February 11, 2015 deposition of Rich Hallworth.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED this 26th day of May, 2015.

ROSENTHAL GREENE & DEVLIN, PC

/s/ John T. Devlin

Elden M. Rosenthal, OSB No. 722174

Email: elden@rgdpdx.com

Michael A. Greene, OSB No. 802445

Email: mike@rgdpdx.com

John T. Devlin, OSB No. 042690

Email: john@rgdpdx.com

Phone: (503) 228-3015

Fax: (503) 228-3269

Of Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I served true and correct copies of the foregoing:

**1. DECLARATION OF JOHN T. DEVLIN IN SUPPORT OF PLAINTIFFS'
THIRD MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

on the following:

James Daigle
Adam Heder
Stewart Sokol & Larkin LLC
2300 SW First Ave., Suite 200
Portland, OR 97201
jmdaigle@lawssl.com
aheder@lawssl.com

Richard K. Hansen
Anne M. Talcott
Schwabe, Williamson & Wyatt, P.C.
1211 SW 5th Ave., Suite 1900
Portland, OR 97204
rhansen@schwabe.com
atalcott@schwabe.com

Of Attorneys for Corizon defendants.

Of Attorneys for Corizon defendants.

Robert L. Goldstucker
Nall & Miller, LLP
235 Peachtree St., NE
Suite 1500 – North Tower
Atlanta, GA 30303-1418
bgoldstucker@nallmiller.com

Sebastian Tapia
Stephen Dingle
Lane County Counsel
125 East 8th Avenue
Eugene, OR 97401
Sebastian.tapia@co.lane.or.us
Stephen.dingle@co.lane.or.us

Of Attorneys for Corizon defendants.

Of Attorneys for Lane Co. defendant.

by the following method/s:

_____ mail with postage prepaid, deposited in the US mail at Portland, OR
 X service made via electronic mailing and/or CM/ECF filing
_____ hand delivery
_____ facsimile transmission
_____ overnight delivery.

Dated this 26th day of May, 2015.

/s/ John T. Devlin
ELDEN M. ROSENTHAL, OSB No. 722174
MICHAEL A. GREENE, OSB No. 802445
JOHN T. DEVLIN, OSB No. 042690
Of Attorneys for Plaintiffs